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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re:

: Chapter 11

SEARS HOLDINGS CORPORATION, *et al.*,

: Case No. 18-23538 (RDD)

Debtors.

: (Jointly Administered)
: :
-----X

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE AND DOCUMENTS**

PLEASE TAKE NOTICE that, the undersigned hereby appears as counsel for International Business Machines Corporation ("IBM"), a party in interest herein under 11 U.S.C. § 1109(b), in the above-captioned case. Such counsel hereby enters its appearance, pursuant to 11 U.S.C. § 1109(b) and Federal Rule of Bankruptcy Procedure 9010, and, pursuant to 11 U.S.C. §§ 102(1) and 342, and Federal Rules of Bankruptcy Procedure 2002, 3017 and 9007, requests that copies of all notices or pleadings filed, given or required to be given in this case, and all papers served or required to be served in this case, be delivered to and served upon the undersigned at the following offices, post office addresses, email addresses, fax and telephone numbers:

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PLEASE TAKE FURTHER NOTICE that, the foregoing request includes not only notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above but also includes, without limitation, all other notices, papers, reports, orders, agenda letters, applications, motions, petitions, pleadings, requests, complaints or demands, statements of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex or otherwise, which affects the Debtors or the property of the Debtors.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure 3017(a), IBM requests that its counsel be provided with copies of any disclosure statements and plans of reorganization.

This Notice of Appearance and Request for Notice and Documents shall not be deemed or construed to be a waiver of the rights of IBM to (i) have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) have the District Court or the Bankruptcy Court abstain from hearing any

matter subject to such abstention, (iv) have the District Court withdraw the reference in
any matters subject to such withdrawal, or (v) any other rights, claims,
set-offs, or recoupments to which it may be entitled, which rights it expressly reserves.

Dated: New York, New York
October 25, 2018

SATTERLEE STEPHENS LLP

Attorneys for International Business
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By: 

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DECLARATION OF SERVICE

Christopher R. Belmonte, declares:

1. I am a partner of Satterlee Stephens LLP which represents International Business Machines Corporation. I am a citizen of the United States, over the age of 18, and competent to make this Declaration.

2. On October 25, 2018, I caused to be electronically filed the Notice of Appearance and Request for Notice and Documents on behalf of International Business Machines Corporation with the Clerk of the court (using the CM/ECF System).

3. In addition, on October 25, 2018, I caused to be served the foregoing document via U.S. Mail upon the persons listed below:

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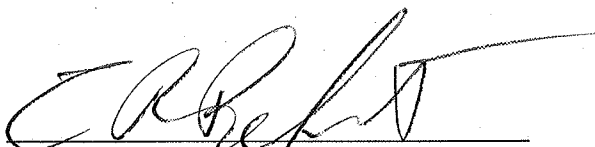
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 25th day of October, 2018, at New York, New York.

By:



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